## REMARKS

Claims 1-7, 12-19, and 24 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Zavracky et al. (US 6,552,704), and claims 8-11 and 20-23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Zavracky et al. Applicants respectfully traverse these rejections for the following reasons.

Independent claim 1 recites a method of driving a liquid crystal display device during one display frame including a step of "applying a reference common voltage to the plurality of liquid crystal cells." Similarly, independent claim 13 recites a method of driving a liquid crystal display device during one display frame including steps of inputting data signals to a plurality of liquid crystal cells and applying a reference common voltage to the plurality of the liquid crystal cells, "wherein one of a high-level common voltage and a low-level common voltage is applied to the plurality of liquid crystal cells during the inputting step."

The Office Action alleges (page 2, lines 8-9 of Item #3) that Zavracky et al. teaches in FIGs. 12A-12C a method for driving a liquid crystal display device including a step of "applying a reference common voltage (Vcom) to a plurality of liquid crystal cells (Cpix)." In addition, and in direct contradiction to the rejection under 35 U.S.C. § 102(e) in view of Zavracky et al., the Office Action alleges (page 5, lines 2-4) "it is well known in the art to apply a reference common voltage to a plurality of liquid crystal cells in the LCD." Applicants respectfully disagree.

In contrast to the claimed invention, Zavracky et al. teaches in FIG. 12B, for example, alternatingly applying one of a high common voltage (VcomHIGH) and a low common voltage (VcomLOW) while applying one of a video signal (ACTUAL VIDEO) and an inverted video

signal (INVERTED VIDEO) for every display frame. Moreover, Zavracky et al. discloses maintaining high-level or low-level common voltages during the application of the video signals. Accordingly, Applicants respectfully assert that Zavracky et al. fails to teach or suggest a method of driving a liquid crystal display device during one display frame including a step of "applying a reference common voltage to the plurality of liquid crystal cells," as recited by both independent claims 1 and 13, and hence dependent claims 2-12 and 14-24.

With regard to the Office Action's allegation that "it is well known in the art to apply a reference common voltage to a plurality of liquid crystal cells in the LCD," Applicants respectfully submit that none of the prior art of record teaches, either explicitly or implicitly, that a method of driving a liquid crystal display device including each of the steps recited by both independent claims 1 and 13 is common knowledge or well known in the art. Moreover, Applicants respectfully traverse the "Official Notice" set forth in the Office Action.

As point out in MPEP 2144.03B, "[I]f such notice is taken, the basis for such reasoning must be set forth explicitly." In addition, "[t]he Examiner must provide specific factual findings predicated on sound technical and scientific reasoning to support his or her conclusion of common knowledge. See *Soli*, 317 F.2d at 946, 37 USPQ at 801." Accordingly, since the Examiner has not provided any sound technical or scientific reasoning to support the allegation that applying a reference common voltage to a plurality of liquid crystal cells during the steps recited by independent claims 1 and 13 is common knowledge or well known in the art, Applicants respectfully submit that the combination of steps recited in independent claim 1 and 13 is not well known. Thus, as directly contradicted in the Office Action, Zavracky et al. fails to teach or suggest each feature of independent claims 1 and 13, and the step of "applying a

reference common voltage to the plurality of liquid crystal cells," as recited by both independent claims 1 and 13, is neither well known, common knowledge, nor supported by the prior art of record.

As required by MPEP 2144.03C, "[i]f applicant adequately traverses the examiner's assertion of official notice, the examiner must provide documentary evidence in the next Office action if the rejection is to be maintained. See 37 CFR 1.104(c)(2)." Thus, Applicants respectfully request documentary evidence that applying a reference common voltage to a plurality of liquid crystal cells during the steps recited by independent claims 1 and 13 is common knowledge or well known in the art if the rejections of claims 1-24 under 35 U.S.C. §§ 102(e) and 103(a) in view of Zavracky et al. are to be maintained.

Furthermore, even if the rejections of claims 1-24 under 35 U.S.C. §§ 102(e) and 103(a) in view of Zavracky et al. are maintained and Official Notice taken by the Examiner is factually supported by documentary evidence, Applicants respectfully traverse any rejection predicated upon the Official Notice on grounds that a lack of proper motivation exists to modify the teachings of Zavracky et al. For example, since none of the prior art of record either teaches or suggests modifying the method disclosed by Zavracky et al. to arrive at the invention of at least independent claims 1 and 13, then there is no motivation to modify Zavracky et al. Thus, no prima facie case of obviousness of at least independent claims 1 and 13 may be alleged.

For at least the above reasons, Applicants respectfully assert that the rejections under 35 U.S.C. §§ 102(e) and 103(a) should be withdrawn because Zavracky et al. neither teaches nor suggests the novel combination of features recited in amended independent claims 1 and 13, and hence dependent claims 2-12 and 14-24.

## CONCLUSION

In view of the foregoing, Applicants respectfully request reconsideration and timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

**MORGAN, LEWIS & BOCKIUS LLP**

By: _____
David B. Hardy
Reg. No. 47,362

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**CUSTOMER NO. 09629**
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: (202) 739-3000